

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Dominique B. Lovejoy,)
)
Plaintiff,)
) Case No. 3:23-cv-05393-MGL
v.)
)
Jason L. Richardson, Rocket Expediting, LLC,)
Super Ego Holdings, LLC, Super Ego) **PLAINTIFF'S ANSWERS TO**
Logistics, LLC, Stefan Perovis, and Sendmee) **RULE 26.01 INTERROGATORIES**
Trucking, LLC,)
)
Defendants.)
)

COMES NOW, Plaintiff, Dominique Lovejoy, in the above-styled civil action, files his Answers to Interrogatories in accordance with Local Rule 26.01 and showing this Honorable Court as follows:

Interrogatory A: State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: Plaintiff is unaware of any subrogation interested entities at this time. Plaintiff reserves the right to supplement this answer at a later date.

Interrogatory B: As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff is entitled to and has requested a jury trial as to this claim.

Interrogatory C: State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Plaintiff is a private individual.

Interrogatory D: State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: Plaintiff originally filed suit in Richland County, which is where the substantial part of the events, acts, and omissions giving rise to the claim occurred. Defendants removed this case to the United States District Court, District of South Carolina, Columbia Division on October 26, 2023, pursuant to 28 U.S.C. §§ 1441 and 1446.

Interrogatory E: Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Xavier Hannibal, George Dalton, and Pamela Dalton v. Rocket Expediting, LLC, Super Ego Holdings, LLC, Super Ego Logistics, LLC, Stefan Perovic, Jason Richardson, and Sendmee Trucking, LLC; Case no. 3:23-cv-02702-MGL, currently pending in the Columbia Division, arises from the same motor vehicle accident and involves the same Defendants.

Interrogatory H: Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER:

Defendant Jason Richardson is a citizen and resident of Alabama.

Defendant Sendmee Trucking, LLC is a Limited Liability Company organized under the laws of the State of Alabama with its principal place of business in Alabama. Additionally, all members of the LLC are residents of the state of Alabama.

Defendant Rocket Expediting, LLC is a Limited Liability Company organized under the laws of the State of Ohio with its principal place of business in Ohio. Additionally, all members of the LLC are residents of the state of Ohio.

Defendant Super Ego Holdings, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Super Ego Logistics, LLC is a Limited Liability Company organized under the laws of the State of Illinois with its principal place of business in Illinois. Additionally, all members of the LLC are residents of the state of Illinois.

Defendant Stefan Perovic is a citizen and resident of the State of Illinois.

McWHIRTER, BELLINGER & ASSOCIATES, P.A.

s/Bennett E. Casto
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Lexington, South Carolina
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